

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:22 CR 00639 MTS/SRW
)	
RAY BRADLEY,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Nathan Chapman and Angie E. Danis, Assistant United States Attorneys for said District, and move this Court to order the defendant detained pending trial, and further requests that a detention hearing be held at the time defendant's initial appearance before the United States Magistrate Judge pursuant to Title 18, United States Code, Section 3141, et. seq., and per current guidance from the Court.

As for its grounds for detention, the government requests this Court to consider the following factors pursuant to Title 18, United States Code, Section 3142.

Presumption of Detention

1. The defendant is charged with conspiracy to commit murder for hire and the substantive offense of murder for hire, in violation of Title 18, United States Code, Sections 2 and 1958. These offenses carry a mandatory life sentence or the possibility of the death penalty upon conviction. As such, there is a presumption of detention pursuant to Title 18, United States Code, Section 3142(f)(1)(B) (an offense for which the maximum sentence is life imprisonment or death).

The Nature and Circumstances of the Offense

2. Title 18, United States Code, Section 3142(g) requires this Court to consider the nature and characteristics of the offense charged, including whether the offense is a controlled substance offense or a crime of violence. The instant offense is a crime of violence. This Court should consider that defendant Ray Bradley booked the flight for the victim to come from New Jersey to St. Louis on April 21, 2022. Within approximately an hour of victim's arrival, he was executed in Penrose Park, within the City of St. Louis.

The Weight of the Evidence Against the Defendant

3. Section 3142(g)(2) requires this Court to consider the weight of the evidence against the defendant. The Government submits that the weight of the evidence against the defendant is strong. While the defendant was not present at the scene of the homicide to pull the trigger, he specifically arranged for victim Titus Armstead's travel to St. Louis for the sole purpose of him being murdered in order to cover for the robbery of several million dollars' worth of cocaine and narcotics proceeds in New Jersey on or about April 19, 2022. The evidence in this case is supported by surveillance footage, cellular telephone location data, social media account information, telephone toll analysis, search warrants and seizures, as well as data extracted from the forensic examination of several electronic devices.

The History and Characteristics of the Defendant

4. The defendant was on Supervised Release (being supervised in the Western District of Washington) for a marijuana trafficking offense arising out of the Eastern District of Missouri for which he was convicted in 2014 and sentenced to 82 months' imprisonment. Between September and October, 2022, the Probation Office for the Western District of Washington petitioned the Court to revoke Bradley's supervision on the grounds that Bradley had traveled out of the District without authorization.

The Nature and Seriousness of the Danger to the Community

5. The defendant orchestrated the murder of a member of his own drug trafficking network and arranged for the victim's travel from New Jersey to St. Louis in order to carry out the murder, all while under federal supervision. It is difficult to imagine a greater threat to the community.

Risk of Flight

6. There a serious risk that the defendant will flee because he is facing a significant sentence in this case, based on the severity of the charges alone. However, the Government has also discovered that, despite being ordered to stay within the Western District of Washington pursuant to the terms of his Supervised Release, between April of 2021 and May of 2022, the Defendant booked travel to the following cities: Atlanta, Georgia; Charlotte, North Carolina; Denver, Colorado; Detroit, Michigan; Fort Lauderdale, Florida; Queens, New York; Las Vegas, Nevada; Lexington, Kentucky; Minneapolis, Minnesota; Newark, New Jersey; Ontario, California; Chicago, Illinois; Seattle, Washington; San Francisco, California; Salt Lake City, Utah; and St. Louis, Missouri. Furthermore, in April of 2022, Bradley's primary cellular telephone displayed location data consistent with him traveling to the following locations: Atlanta, Georgia; Central Pennsylvania; Chicago, Illinois; Cleveland, Ohio; Denver, Colorado; Des Moines, Iowa; Houston, Texas; Kansas City Metropolitan Area; Long Island, New York; Montana; North Carolina; Oklahoma City; and Washington, D.C.

Lastly, a string of Google searches obtained from a search warrant on Bradley's Gmail account revealed that on May 18, 2022, Bradley had conducted searches related to whether a passport was needed to enter Mexico, followed by searches about the Department of Justice's policies regarding the prosecution of murder-for-hire offenses.

Conclusion

7. The government submits that when considering all of the factors outlined in Title 18, United States Code, Section 3142(g), the factors weigh heavily in favor of detention. There is clear and convincing evidence that no condition or combination of conditions that will reasonably assure the safety of any other person and the community as well as the appearance of the defendant.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Angie E. Danis
NATHAN CHAPMAN, #60978MO
ANGIE E. DANIS, #64805MO
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November, 2022, I filed a true and correct copy of the foregoing electronically with the Clerk of the Court, to be served by way of the Court's electronic filing system upon the attorney for the defendant.

/s/ Angie E. Danis
ANGIE E. DANIS, #64805MO
Assistant United States Attorney